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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DARNISHA JOHNSON, an individual,)	Case No. 2:20-cv-00399-JCM-EJY
Plaintiff,)	
vs.)	STIPULATION AND ORDER TO
)	EXTEND DISCOVERY
JAMES RIVER INSURANCE COMPANY,)	(SECOND REQUEST)
an Illinois corporation; DOES I through X;)	
and ROE CORPORATIONS I through X,)	
inclusive,)	
Defendant.)	

All of the parties hereto, and for good cause described in this stipulation, and in accord with Local Rule 6-1 and Local Rule 26-4, the parties hereby request this Honorable Court to adopt and approve this stipulated extension to the discovery plan, and continue the discovery deadlines for 30-days as requested herein.

I. LOCAL RULE 6-1 IS SATISFIED

This is the second request for extension of discovery deadlines filed by the parties. Pursuant to the Stipulation and Order to Extend Discovery (First Request) from September 12, 2020, the following dates govern for purposes of discovery:

- | | |
|---------------------------|-------------------|
| 1. Discovery Cutoff Date: | January 29, 2021 |
| 2. Expert Designations: | November 30, 2020 |

3. Rebuttal Expert Designations: December 30, 2020

4. Dispositive Motions: March 1, 2021

5. Joint Pre-Trial Order: March 31, 2021

Due to Covid-19, there have been delays in obtaining Plaintiff's medical records and conducting additional discovery such as depositions and an Independent Medical Examination. Defendant has noticed an Independent Medical Examination of the Plaintiff for November 2, 2020. However, Defendant's medical expert has reported that he needs a minimum of 45-days after the examination to complete his initial expert report. Accordingly, the parties are requesting a 30-day extension to all discovery deadlines.

The instant request comports with Local Rule 6-1, in that no request is being made after the expiration of the specified period.

I. LOCAL RULE 26-4 IS SATISFIED

The instant request to extend discovery deadlines satisfies the requisites of Local Rule 26-4. Additionally, good cause exists for the extension. Due to Covid-19, there have been delays in obtaining Plaintiff's medical records and conducting additional discovery such as depositions and an Independent Medical Examination. Defendant has noticed an Independent Medical Examination of the Plaintiff for November 2, 2020. However, Defendant's medical expert has reported that he needs a minimum of 45-days after the examination to complete his initial expert report. Accordingly, the parties are requesting a 30-day extension to all discovery deadlines.

Listed below is a statement specifying the discovery completed in this case:

Plaintiff's Rule 26 Initial Disclosures April 21, 2020

Defendant James River Insurance Company's Initial Disclosure of Witnesses
And Documents Pursuant to FRCP 26(a)(1) April 23, 2020

Plaintiff's First Set of Discovery Requests May 18, 2020

Defendant James River Insurance Company's
Responses to Plaintiff's First Set of Requests
For Admission July 7, 2020

1	Defendant James River Insurance Company's	July 7, 202
2	Responses to Plaintiff's First Set of Requests	
3	For Production	
4	Defendant James River Insurance Company's	July 7, 202
5	Responses to Plaintiff's First Set of	
6	Interrogatories	
7	Defendant James River Insurance Company's	August 18, 2020
8	First Set of Requests for Admission to Plaintiff	
9	Darnisha Johnson	
10	Defendant James River Insurance Company's	August 18, 2020
11	First Set of Requests for Production to Plaintiff	
12	Darnisha Johnson	
13	Defendant James River Insurance Company's	August 18, 2020
14	First Set of Interrogatories to Plaintiff Darnisha	
15	Johnson	
16	Plaintiff's Responses to Defendant's First Set	October 1, 2020
17	Of Requests For Admissions, Interrogatories,	
18	And Requests for Production of Documents	
19	Plaintiff's Designation of Expert Witnesses	October 1, 2020
20	And Documents	

21 Due to Covid-19, there have been delays in obtaining Plaintiff's medical records
 22 and conducting additional discovery such as depositions and an Independent Medical
 23 Examination. Defendant has noticed an Independent Medical Examination of the
 24 Plaintiff for November 2, 2020. However, Defendant's medical expert has reported
 25 that he needs a minimum of 45-days after the examination to complete his initial expert
 26 report.

27 Finally, under Local Rule 26(4), it is necessary to articulate a proposed schedule
 28 for completing all remaining discovery. The parties are requesting an additional 30-
 days be afforded for discovery.

The following deadlines are requested.

1	1. Discovery Cutoff Date:	March 1, 2021
2	2. Expert Designations:	January 4, 2021
3	3. Rebuttal Expert Designations:	February 3, 2021
4	4. Dispositive Motions:	March 31, 2021

5. Joint Pre-Trial Order:

April 30, 2021

The parties hereby stipulate to the proposed changes in the discovery deadlines.

Dated this 8th day of October, 2020

Dated this 8th day of October, 2020

LOWE LAW GROUP

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ORDER

IT IS SO ORDERED:


ELAYNA J. YOUCHAK
UNITED STATES MAGISTRATE JUDGE

Dated: Oct. 8, 2020

The **STIPULATION AND ORDER TO EXTEND DISCOVERY (SECOND**

REQUEST) in 2:20-cv-00399-JCM-EJY was submitted by:

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